

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

SAUL EWING LLP  
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Proposed Counsel to the Debtors and Debtors in Possession

In Re:  
NEW JERSEY ORTHOPAEDIC INSTITUTE  
LLC, et al.

Debtors.

Case No.: 25-11370 (JKS)

Judge: John K. Sherwood

Chapter: 11

**APPLICATION FOR RETENTION OF PROFESSIONAL**

1. The applicant, New Jersey Orthopaedic Institute LLC, is the (check all that apply):

Trustee:       Chap. 7       Chap. 11       Chap. 13.  
 Debtor:       Chap. 11       Chap. 13  
 Official Committee of \_\_\_\_\_

2. The applicant seeks to retain the following professional Saul Ewing LLP to serve as (check all that apply):

Attorney for:       Trustee       Debtor-in-Possession  
 Official Committee of \_\_\_\_\_  
 Accountant for:       Trustee       Debtor-in-possession  
 Official Committee of \_\_\_\_\_

Other Professional:

Realtor

Appraiser

Special Counsel

Auctioneer

Other (specify): \_\_\_\_\_

3. The employment of the professional is necessary because:

of Saul Ewing's extensive experience in representing debtors and handling business reorganizations under chapter 11 of the Bankruptcy Code.

4. The professional has been selected because:

Saul Ewing has expertise and experience in practicing before the Court that will permit Saul Ewing to work in an efficient and cost-effective manner on behalf of the Debtors' estates. Saul Ewing is also familiar with the Debtors' business.

5. The professional services to be rendered are as follows:

Saul Ewing is to provide an assortment of legal services, including legal advice on the Debtors' powers and duties as debtors in possession, the preparing and pursuit of approval of a disclosure statement and confirmation of a plan, and drafting pleadings.

6. The proposed arrangement for compensation is as follows:

For its primarily involved attorneys, Saul Ewing will charge hourly rates of \$860.00 for Stephen B. Ravin, \$485.00 for Turner N. Falk, and \$325.00 for Maxwell M. Hanamirian.

The firm will be reimbursed for reasonable and necessary expenses.

7. To the best of the applicant's knowledge, the professional's connection with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

None

Describe connection: Saul Ewing performed services for the Debtors in the months leading up to the bankruptcy.

8. To the best of the applicant's knowledge, the professional (check all that apply):

- does not hold an adverse interest to the estate.
- does not represent an adverse interest to the estate.
- is a disinterested person under 11 U.S.C. § 101(14).
- does not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which he/she will be retained under 11 U.S.C. § 327(e).
- Other; explain: Saul Ewing LLP had outstanding invoices for services rendered prior to the Chapter 11 filing in the sum of \$15,315.50.  
Saul Ewing LLP has waived its rights to the collection of said sum.

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

The applicant respectfully requests authorization to employ the professional to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may determine and allow.

Date: March 12, 2025

/s/ Kinga Skalska-Dybas, CFO of the Debtors

Signature of Applicant